

## **Exhibit D**

**David Rothstein**

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**From:** David Rothstein <drothstein@rothsteinlawfirm.com>  
**Sent:** Monday, January 26, 2015 6:29 PM  
**To:** Kathryn Thomas (KThomas@gsblaw.net) (KThomas@gsblaw.net)  
**Cc:** kathy.helms@ogletreedeakins.com  
**Subject:** Irani v. Palmetto Health et al.

Dear Kathryn. I have had a chance to review your discovery responses, and I am frankly shocked at your failure or refusal to respond to Plaintiff's interrogatories and requests for production in a manner that remotely resembles good faith. I do not understand why you required an extension to object to 13 out of 16 interrogatories in Plaintiff's First Set of Interrogatories. You also have not provided a single document in response to the requests for production. The scheduling order in this case requires an informal telephone conference with Judge Currie before the filing of a motion to compel. Please let me know what your availability is like this week so that I can contact Judge Currie's chambers to schedule this telephone conference. Thank you. Dave.

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